

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

In re:	§	
JAMISON DYER	§	Case No. 24-80163-G5-13
	§	(Chapter 13)
Debtor	§	
	§	
ALEJANDRO SANCHEZ	§	
Movant	§	
	§	
JAMISON DYER	§	
Respondent	§	

**DEBTOR'S RESPONSE TO THE MOTION FOR
RELIEF FROM AUTOMATIC STAY (Docket #44) AND
REQUEST FOR HEARING**

JAMISON DYER ("Debtor"), responds to the Motion for Relief from the Automatic Stay (Docket #44) ("Motion") filed by ALEJANDRO SANCHEZ ("Movant") with regard to the collateral or property described by Movant in the Motion (the "Property") and will show the court as follows:

Specific Responses

1. Debtor has insufficient information and therefore denies the allegations contained in paragraph 1.
2. Debtor admits the allegations contained in paragraph 2.
3. Debtor has insufficient information and therefore denies the allegations contained in paragraph 3.

4. Debtor has insufficient information and therefore denies the allegations contained in paragraph 4.
5. Debtor admit the allegations in Paragraph 5.
6. Debtor admit the allegations in Paragraph 6.
7. Debtor denies the allegations contained in paragraph 7 as to any relief.
8. Debtor has insufficient information and therefore denies the allegations contained in paragraph 8.
9. Debtor admits the allegations in 9 as to the quoted language from the state court but denies that such judgment is final.
10. Debtor admits the allegations contained in paragraph 10.
11. Debtor admits that the case was dismissed on May 30, 2024, but has insufficient information to admit or deny the remaining allegations contained in paragraph 11.
12. Debtor has insufficient information and therefore denies the allegations contained in paragraph 12.
13. Debtor admits the allegations contained in paragraph 13.
14. Debtor admits the allegations contained in paragraph 14.
15. Debtor has insufficient information and therefore denies the allegations contained in paragraph 15. Debtor has no basis to admit or deny what Sanchez allegedly “understands.”
16. Debtor has insufficient information and therefore denies the allegations contained in paragraph 16.
17. Debtor admits the allegations contained in paragraph 17.
18. Debtor has insufficient information and therefore denies the allegations contained in paragraph 18.

19. Debtor has insufficient information and therefore denies the allegations contained in paragraph 19.
20. Debtor admits the allegations contained in paragraph 20.
21. Debtor has insufficient information and therefore denies the allegations contained in paragraph 21.
22. Debtor denies the allegations contained in paragraph 22.
23. Debtor has insufficient information and therefore denies the allegations contained in paragraph 23.
24. The Property is necessary for a successful reorganization of the Debtor.
25. Debtor requests a hearing on the Motion.

WHEREFORE, Debtor respectfully requests the court conduct a hearing on the Motion and after the hearing deny the Motion and grant him such other and further relief to which he is entitled.

Dated: August 15, 2024

Respectfully submitted,

/s/Reese W. Baker

Reese W. Baker

Texas Bar No. 01587700

Sonya Kapp

TX Bar No. 11095395

Nikie Marie Lopez-Pagan

TX Bar No. 2409233

Baker & Associates

950 Echo Lane, Suite 200

Houston, Texas 77024

713-869-9200

713-869-9100 (fax)

ATTORNEYS FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on or about August 15, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

Tiffany D Castro	ecf@ch13hou.com
Trey A Monsour	tmonsour@foxrothschild.com ; rsolomon@foxrothschild.com ; msteen@foxrothschild.com ; TX.DKT@foxrothschild.com
Susan C Norman	suenorman@SueNormanLaw.com ; eastprolaw@msn.com
Cameron A. Secord	csecord@jw.com ; kgradney@jw.com ; dtrevino@jw.com ; jsauceda@jw.com
US Trustee	USTPRegion07.HU.ECF@USDOJ.GOV

A copy of the Debtor's Response to Movant's Motion for Relief from the Automatic Stay was delivered on or about August 15, 2024, to all parties listed below in the manner listed below:

Cameron A. Secord
Jackson Walker, LLP
1401 McKinney Street, Suite 1900
Houston, Texas 77010
Attorney for Movant

Via Email: bruzinsky@jw.com
csecord@jw.com

Scott A Wheatley
Jackson Walker, LLP
777 Main Street, Suite 2100
Fort Worth, Texas 76102
Attorney for Movant

Via Email: swheatley@jw.com

/s/Reese W. Baker
Reese W. Baker